

### **Remarks**

Claims 8 and 13 were previously amended. Claim 20 was previously canceled. Claims 1, 2, 8 and 13 are presently amended. Claims 1-19 are pending in this application. The Examiner has rejected claims 1-19 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,123,248 to Lafleur (hereinafter “Lafleur”) in view of Applicant’s Admitted Prior Art (AAPA, Background) and U.S. patent No. 6,903,706 to Trottier, et al. (hereinafter “Trottier”). Applicants respectfully traverse the Examiner’s rejections.

#### **A. Remarks Regarding Claim Objections**

The Examiner has objected to claims 1, 2, 8 and 13 because of informalities. The Examiner states that the limitation of “the display device connector” should be changed to “the single display device connector.” (Office Action at 2.) Applicants have amended claims 1, 2, 8 and 13 to make the appropriate corrections.

#### **B. Remarks Regarding Rejection of Claims 1-19 Under 35 U.S.C. § 103(a)**

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). “All words in a claim must be considered in judging the patentability of that claim against the prior art.” In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. § 103, then any claim depending therefrom is nonobvious. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

The combination of Lafleur, AAPA and Trottier fails to teach or suggest all the claim limitations of amended independent claims 1, 8 and 13. Specifically, the combination fails to teach or suggest at least “the video display controller is adapted to independently control a first display device and a second display device through the display device connector, without using

an additional video display controller,” as required by claim 1 and as similarly required by claims 8 and 13. The specification discloses that the independent control of two display devices is achieved through the use of a single video display controller. (*See, e.g.*, Fig. 3.) Applicants have amended the independent claims to clarify that the claimed independent control is provided with no more than one video display controller.

The Examiner has recognized that disclosure of the above limitation is not present in either Lafleur or AAPA. (*See* Office Action at 4.) As for Trottier, the Examiner states that “Trottier et al. disclose a video controller independently controlling a first display and a second display (abstract).” (*Id.*) However, as Applicants have clarified with the amendments, the limitations require that independent control of two displays be provided by a single video display controller without using additional display controllers. Trottier does not disclose this limitation. To the contrary, Trottier’s independent control is provided with not one but two independent display controllers. For example, Trottier states:

. . . the two displays are driven with separate images. FIG. 2 illustrates how this is done. A first display controller 1 sends its output data to an encoder 2 through a multiplexor 8. The second input of the multiplexor 8 comes from a second display controller 10, completely independent from display controller 1.

(Trottier 4:14-20.) Thus, Trottier discusses independent control with two controllers, not one. Applicants’ claimed invention, by contrast, requires independent control with no more than one video display controller.

The independent control with one video display controller is a single, integral claim limitation, which Trottier neither teaches nor suggests. Assuming *arguendo* that a person of ordinary skill would combine the Lafleur and AAPA with Trottier, independent control with two controllers would be the result. Therefore, modifying Lafleur and AAPA with Trottier

would not result in the claim limitation. Because none of the references disclose independent control with only one video display controller, the combination fails to disclose the claim limitation.

As Lafleur in combination with AAPA and Trottier fails to teach or suggest each and every element of independent claims 1, 8 and 13, the combination does not anticipate these claims. Applicants respectfully submit that these independent claims allowable. Additionally, Applicants submit that dependent claims 2-7, 9-12 and 14-19 are allowable, as they depend from otherwise allowable base claims.

**C. Remarks Regarding Rejection of Dependent Claims 2-7, 9-12 and 14-19 Under 35 U.S.C. § 103**

The rejection of dependent claims 2-7, 9-12 and 14-19 will not be discussed individually herein, as each of these claims depends, either directly or indirectly, from an otherwise allowable base claim.

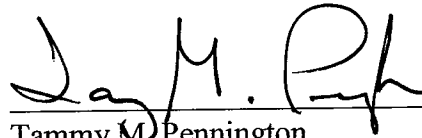
**D. No Waiver**

All of Applicants' arguments and amendments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the cited references. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by examiner, Applicants do not acquiesce to examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicants are sufficient to overcome the anticipation rejections. The current amendments to the claims are sufficient to overcome the novelty and obviousness rejections.

**Conclusion**

Applicants respectfully submit that the pending claims 1-19 of the present invention, as amended, are allowable. Applicants respectfully request that the rejection of the pending claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tammy M. Pennington", written over a horizontal line.

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